

LANXESS Corporation

October 24, 2017

US Environmental Protection Agency
Office of Pesticide Programs; Room S-4900
ATTN: Ms. Stacey Grigsby (Team 34)
2777 South Crystal Drive
Arlington, VA 22202-4501

Subject: Virkon™ S; EPA Registration No. 39967-137

Dear Ms. Grigsby,

Please consider this letter and the included documentation a notification to make updates consistent with PRN 98-10 and 2007-4 to the Master label for EPA Reg. No. 39967-137.

Minor adjustments requested by this update are expressly detailed below:

- Update to trifectant to replace ® with ™
- Update to header (Text to clarify braces (comments to reviewers) and brackets (optional text)) and footer (page numbers and date)
- Update of elements related to ownership change to Lanxess Corporation (approved Oct. 2016)
- Removal of patent reference
- Minor corrections to brackets signifying optional language
- Additional reference language options for users to find additional precaution information and directions for use when such information does not appear on front panel of label
- Correction to references of *Leptospira Canicola* as a virus (fixed to read correctly as a bacteria)
- Optional language added under “Storage and Disposal” to refer user to accompanying labeling for full Storage and Disposal statement for package sizes where full text cannot fit on container label (and notes to reviewer clarifying when condensed text will be used)
- Optional company logo and product/brand specific graphics added
- Correction of typographical errors
- Addition of optional marketing claims

All updates are also highlighted on one copy of the label.

LANXESS Corporation
Actives & Disinfection

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USA

www.us.lanxess.com

Enclosed in support of this action are the following:

- Application for Pesticide Registration (EPA form 8570-1)- Dated October 24, 2017. This also includes Appendix 1 further detailing requested changes
- Two copies of the requested label changes, with one copy highlighted to denote changes
- Email correspondence confirming changes requested to Storage and Disposal statement fall under notification guidelines

Thank you for your assistance with this matter. Please feel free to contact me at 470.747.2488 or email me at Ellen.Baldassare@Lanxess.com if you have any questions.



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Enclosures